

JAMES E. JOHNSON Corporation Counsel

## THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, N.Y. 10007 JOSEPH ZANGRILLI phone: (212) 356-2657 fax: (212) 356-3509 jzangril@law.nyc.gov

December 10, 2019

## **BY ECF**

Honorable Robert M. Levy United States Magistrate Judge United States District Court Eastern District of New York 225 Cadman Plaza E. Brooklyn, NY 11201

Re: Brown v. City of New York, et al., 19 CV 1575 (NGG)(RML)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department assigned to the defense of the City of New York in the above referenced matter. I have spoken with plaintiff's counsel, Robert Marinelli and I write on behalf of both parties to request an adjournment of the telephone conference presently scheduled for Thursday, December 12, 2019 at 10:30 a.m.

The reason for this request is due to the parties having spent considerable time in discussions regarding plaintiff's proposed amended of the complaint. In addition both parties have been in discussion regarding settlement however, the undersigned's Office is still determining settlement authority in order to have meaningful settlement discussions and believe the adjournment will give the defendants' the time necessary.

In the event the Court grants the parties' request, the parties have determined they are available at any time on December 27, 2019 December 30, 2019 or January 3, 2020, or on a date that is convenient to the Court. This is the parties' first request regarding the adjournment of this conference.

The parties thank you for your consideration of this request.

Respectfully submitted,

/s/ Joseph Zangrilli Senior Counsel cc: <u>BY ECF</u>

All counsel of record